

REMARKS

Claims 1 to 30 are pending in the application. Claims 1-6, 9, 12, 14 and 24-30 are rejected under 35 USC § 103 as being unpatentable over Burgard et al. (U.S. Patent Application No. 2002/0023587 hereinafter "Burgard") in view of Achelpohl (U.S. Patent No. 5,816,163, hereinafter "Achelpohl"). In keeping with the foregoing amendment and the following argument, reconsideration is respectfully requested.

To establish a *prima facie* case of obviousness, and hence to find claims 1-6, 9, 12, 14 and 24-30 unpatentable under 35 U.S.C. § 103(a), three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings in a manner that does not change the principle of operation of a reference. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. See generally, MPEP at § 2143.

Burgard, in combination with Achelpohl, or both Achelpohl and Clauditz, does not teach or suggest first applying the used flush solution when the desired amount of clean rinse is not available in the system. Instead, Achelpohl teaches "a second operation which pumps the cleaning solution from the cleaning solution source..." (Achelpohl, col. 4, lines 9-20). There is nothing in this reference to suggest that this cleaning solution has been previously used. Clauditz describes cleaning the coating apparatus using "...a clear flush of pure thinner within the conduit system..." (Clauditz, col. 13, lines 53-55). A clear flush of pure thinner cannot possibly be used flush. Furthermore, Burgard explains a "Warm Water Rinse" phase in which "water is drawn with the supply pump from the water reservoir..." (Burgard, paragraph 0044). Water from a reservoir is not used flush.

Simply put, neither one of the reference, either alone or in any combination, teaches or even suggests the claim limitation. Accordingly, there cannot be a *prima facie* case of obviousness. Moreover, there would be no way to modify any one of the references to reach the claimed invention without destroying the express teachings of the references to use clean flush of water. Accordingly, there would be no suggestion to make the needed modifications hence there again cannot be a proper *prima facie* case of obviousness. Therefore, the rejection

must be withdrawn and claims 1, 15, and 24, and all remaining claims dependent thereon, are in allowable form.

In view of the foregoing, the above-identified application is in condition for allowance. In the event there is any remaining issue that the Examiner believes can be resolved by a telephone conference, the Examiner is respectfully invited to contact the undersigned attorney at (312) 474-6612.

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Respectfully submitted,

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